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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
JULIAN SANTIAGO, and SUSAN LYNN
HARVEY individually and on behalf of all
other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF ALEXANDER
FRAWLEY ISO PLAINTIFFS' MOTION
TO EXCLUDE CERTAIN OPINIONS
AND TESTIMONY OF GOOGLE'S
EXPERTS DONNA HOFFMAN, JOHN
BLACK, AND CHRISTOPHER
KNITTEL**

The Honorable Richard Seeborg
Courtroom 3 – 17th Floor
Date: May 15, 2025
Time: 1:30 p.m.

DECLARATION OF ALEXANDER FRAWLEY

I, Alexander Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 81). I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs' Motion to Exclude Certain Opinions and Testimony of Google's Experts Donna Hoffman, John Black, and Christopher Knittel.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Report of Donna Hoffman, served by Google on May 31, 2023.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Supplemental Expert Report of Donna Hoffman, served by Google on March 24, 2025.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Expert Report of John Black, served by Google on May 31, 2023.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the Expert Report of Christopher Knittel, served by Google on May 31, 2023.

7. Attached hereto as **Exhibit 5** is a true and correct copy of the transcript from the Deposition of Google expert Donna Hoffman, taken by Plaintiffs on July 11, 2023.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the transcript from the Deposition of Google expert Christopher Knittel, taken by Plaintiffs on July 11, 2023.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the Supplemental Expert Report of Bruce Schneier, served by Plaintiffs on January 6, 2025.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the transcript from the deposition of Plaintiff Susan Lynn Harvey, taken by Google on October 27, 2022.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed this 3rd day of April 2025, at New York, New York.

3 /s/ Alexander Frawley
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